

## DEPARTMENTS OF THE ARMY MASSACHUSETTS ARMY NATIONAL GUAR

MASSACHUSETTS ARMY NATIONAL GUARD TRAINING SITE CAMP EDWARDS CAMP EDWARDS, MA 02542-5003

15 December 2011

Ms. Lynne Jennings
United States Environmental Protection Agency, Region I
5 Post Office Square Suite 100
Boston, Massachusetts 02109-3912

Re: Response to EPA letter Dated 7 November 2011

Dear Ms. Jennings,

The Massachusetts Army National Guard (MAARNG) is in receipt of the Environmental Protection Agency's (EPA) letter dated 7 November 2011. The letter focused on issues related to the application of J, K & T Range best management practices within the Operations, Maintenance, and Monitoring Plans (OMMPs).

To address these issues and as part of EPA's consideration of whether to extend the Pilot Period authorizing the firing of lead bullets at J, K and T Range, the EPA requested the MAARNG submit the following in writing no later than December 15<sup>th</sup>:

- 1.) A statement identifying the funding committed by the MAARNG to conduct the monitoring and maintenance activities for the 2012 calendar year. The statement should provide information to demonstrate that the funding is sufficient to cover the routine maintenance and monitoring activities specified in the OMMPs. The statement should also provide information on the procedures that will be followed in the event that additional funding is determined to be necessary to achieve compliance with any aspect of the plan.
- 2) A statement of the contracts secured to conduct the maintenance and monitoring activities required by the OMMPs including an identification of the contractors secured to conduct the work.
- 3.) A list of steps to be taken and proposed implementation schedule to assure management controls and systems are in place to give surety that:
  - a. There is better internal coordination on potential compliance and environmental aspects of CampEdwards operations;
  - b. There is clarity both internally and externally, on MAARNG staff roles and responsibilities;
  - c. There is greater communication on, and response to, current and emerging potential environmental or compliance problems; and,
  - d. Standard Operating Procedures and Camp Edwards Range Regulations are reviewed and updated to improve compliance and better address potential problems caused by MAARNG staff turnover.

4) A list of steps and an organizational chart to demonstrate the roles and responsibilities for providing the required notifications under the AOs and OMMPs.

Enclosed with this letter is a packet with detailed documentation addressing the requirements outlined in the 7 November 2011 letter from the USEPA.

Please do not hesitate to contact me at 508-968-5883 or at richard.bertone@us.anny.mil if you have any questions.

Copies of this letter and associated documentation will be sent to Thomas Sellars (Brigadier General Retired), MAARNG, Mr. Mark Begley, Executive Director, Environmental Management Commission, and Mr. Leonard Pinaud, Massachusetts Department of Environmental Protection.

Sincere y

Richard M. Bertone

Lieutenant Colonel, MAARNG

Deputy Commander, Camp Edwards

Enclosures